



February 18, 2015  
Via ECFS Filing

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
9300 East Hampton Drive  
Capitol Heights, MD 20743

**RE: Dollar Phone Corp.  
EB Docket No. 06-36; CY2014**

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2014 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of Dollar Phone Corp.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to [stthomas@tminc.com](mailto:stthomas@tminc.com). Thank you for your assistance in this matter.

Sincerely,

/s/Sharon Thomas

Sharon Thomas

Consultant to Dollar Phone Corp.

cc: Aaron Schulman, DPC  
file: DPC - FCC - Other  
tms: FCx1501

Enclosures  
ST/im

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification

Covering calendar year 2014

Name of company(s) covered by this certification:

**Dollar Phone Corp.**

Form 499 Filer ID:

**823792**

Name of signatory:

**Moses Greenfield**

Title of signatory:

**Chief Executive Officer**

1. I, Moses Greenfield, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. §64.2001 *et seq.*
2. Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in §64.2001 *et seq.* of the Commission's rules.
3. The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.
5. The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.



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Moses Greenfield, Chief Executive Officer

2/18/2015

Date

**Attachments:**      Accompanying Statement explaining CPNI procedures

**Attachment A**  
**Statement of CPNI Procedures and Compliance**

## **Dollar Phone Corp.**

### **Statement of CPNI Procedures and Compliance**

Dollar Phone Corp. ("Dollar Phone" or "Company") provides wholesale telecommunications services to other carriers and as such does not have any subscribed service relationship with any business or residential customers. The Company does not obtain, retain or use CPNI for marketing or any other purpose. Although the Company does have call detail records, it does not have any information regarding the calling or called party, and such information is not used for any marketing purposes. Dollar Phone is committed to protecting the confidentiality of all customer information, including CPNI and call detail records. Company employees are prohibited from disclosing such information and the Company provides for disciplinary action for such violations, up to and including termination of employment.

As a wholesale service provider, Dollar Phone does not market its services to end users. Any marketing efforts would be directed towards other carriers and would not involve the use of CPNI or call detail records.

The Company does not disclose call record information over the telephone.

The Company does not disclose detail records on-line.

The Company does not have any retail locations and therefore does not disclose call detail records in-store.

Should Dollar Phone expand its business in the future to include the provision of services that involve CPNI, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI, including call detail records, is used or disclosed.

Requests for call detail records by law enforcement agencies are only granted under subpoena.

To the extent the Company provides services in the future that involves CPNI or call detail records, the Company will ensure that it establishes procedures to notify law enforcement in the event of a breach of such CPNI, including call detail records, to ensure that notification is provided in the time period set

forth in the FCC's rules, or if applicable, when so authorized by law enforcement. In addition, the Company would institute a process to record all breaches discovered and to provide notification to the United States Secret Service, FBI and customers, to the extent possible.

The Company did not have any breaches during 2014.

The Company has not taken any actions against data brokers in the last year.

The Company did not receive any complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI, including call detail records, in calendar year 2014.

The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI or call detail records.